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 CONTRA COSTA COUNTY, ET AL.

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

CLARK WALKER,  
 Plaintiff,  
 v.  
 CONTRA COSTA COUNTY, KEITH  
 RICHTER, and RICHARD GRACE,  
 Defendants.  
 AND RELATED CASE.

NOS. C05-2800 TEH  
 C03-3723 TEH

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO FILE SUPPLEMENTAL  
 JURY INSTRUCTIONS**

1           1.       Plaintiff CLARK WALKER (“Chief Walker”) and Defendants CONTRA  
2 COSTA COUNTY, KEITH RICHTER, and RICHARD GRACE, by and through their respective  
3 counsel, jointly apply for an Order, pursuant to Civil Local Rule 6-2, to permit Plaintiff to file two  
4 (2) supplemental jury instructions.

5           2.       Good cause exists to permit Plaintiff to file two additional jury instructions.  
6 One instruction stems from the October 31, 2006 deposition testimony by Defendants’ retained  
7 expert, Dr. Mark Nathan, pertaining to Plaintiff’s damages. The second instruction pertains to the  
8 meaning of the Croskrey Consent Decree, subject to the Court’s ruling of Defendants’ Motion In  
9 Limine to Exclude Evidence of Consent Decree and Statement Relating to Consent Decree and  
10 Defendants’ Motion In Limine to Preclude Opinion Testimony to Meaning of Consent Decree filed  
11 October 24, 2006. Both of these events post-date the October 18, 2006 filing deadline for jury  
12 instructions.

13           3.       Therefore, the parties respectfully request that Plaintiff be permitted to  
14 submit two (2) additional jury instructions, and Defendants be permitted to file objections within  
15 seven (7) calendar days of the date of Plaintiff’s submission.

16 DATED: November 14, 2006

PRICE AND ASSOCIATES

/s/

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OK-HEE SHIM, Attorneys for  
Plaintiff CLARK WALKER

21 DATED: November 14, 2006

SILVANO B. MARCHESI, County Counsel

/s/

\_\_\_\_\_  
BERNARD L. KNAPP, Deputy County Counsel,  
Attorneys for Defendants CONTRA COSTA  
COUNTY, KEITH RICHTER, and RICHARD  
GRACE

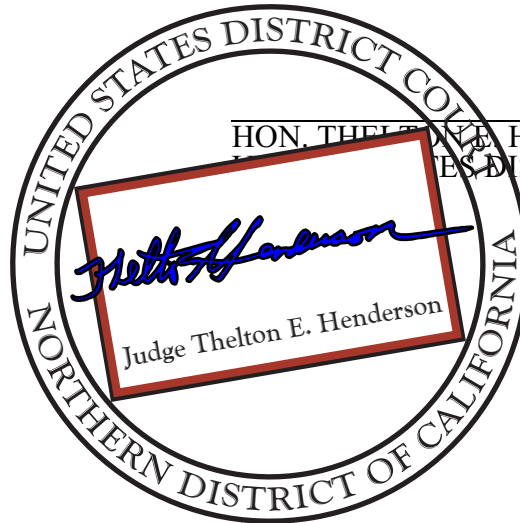
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**ORDER**

Pursuant to the foregoing Stipulation and good cause appearing therefor, **IT IS**  
**HEREBY ORDERED** that Plaintiff is to submit two (2) additional jury instructions, and  
Defendants are to file objections within seven (7) calendar days of the date of Plaintiff's  
submission.

Date: 11/20/06



HON. THELTON E. HENDERSON  
DISTRICT JUDGE